

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

**TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider whether certain materials should be sealed. Plaintiffs file these materials under seal out of an abundance of caution because they contain references to documents produced and marked confidential by Uber.

**Material To Be Filed Under Seal**

The materials to be filed under seal are portions of the parties' Joint Dispute Letter re: Privilege Log Disputes and exhibits attached thereto. Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
Portions of Joint Discovery Letter re: Privilege Log Disputes	References to documents marked Confidential	Uber
Portions of Declaration of T. Ellis ISO Joint Discovery Letter	References to documents marked Confidential	Uber
Ex. A to Ellis Declaration ISO Joint Discovery Letter	Document produced by Uber and marked Confidential	Uber
Ex. B to Ellis Declaration ISO Joint Discovery Letter	Chart created using privilege logs marked Confidential	Uber
Ex. C to Ellis Declaration ISO Joint Discovery Letter	Chart created using privilege logs marked Confidential	Uber
Declaration of S. Binnings ISO Joint Discovery Letter	Contains information deemed confidential by Uber	Uber
Declaration of D. Kolta ISO Joint Discovery Letter	Contains information deemed confidential by Uber	Uber
Declaration of M. Frangopoulos ISO Joint Discovery Letter	Contains information deemed confidential by Uber	Uber

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules. None of the information at issue was marked confidential by Plaintiffs. Pursuant to the Court’s order at Dkt. 1559, Uber must file its statement within one day.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Tiffany R. Ellis in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: October 30, 2024

Respectfully submitted,

By: /s/ Roopal P. Luhana

Roopal P. Luhana

**CHAFFIN LUHANA LLP**

600 Third Avenue, 12th Floor

New York, NY 10016

Telephone: (888) 480-1123

Facsimile: (888) 499-1123

luhana@chaffinluhana.com

By: /s/ Sarah R. London

Sarah R. London (SBN 267093)

**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**

275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: (415) 956-1000  
Facsimile: (415) 956-1008  
slondon@lchb.com

By: /s/ Rachel B. Abrams

Rachel B. Abrams (SBN 209316)

**PEIFFER WOLF CARR KANE  
CONWAY & WISE, LLP**

555 Montgomery Street, Suite 820  
San Francisco, CA 94111  
Telephone: (415) 426-5641  
Facsimile: (415) 840-9435  
rabrams@peifferwolf.com

*Co-Lead Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on October 30, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to registered parties.

/s/Roopal Luhana